



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COLUMBIA ENVIRONMENTAL FIELD OFFICE
1421 HAMPSHIRE PIKE
COLUMBIA, TENNESSEE 38401
PHONE (931) 380-3371 STATEWIDE 1-888-891-8332 FAX (931) 380-3397**

January 27, 2017

Mr. Doug Kibbey
City Manager
City of Clifton
P.O. Box 192
Clifton, TN 38425

Re: Compliance Evaluation Inspection
 Clifton STP#2
 NPDES Permit No. TN0067423
 Clifton, Wayne County, Tennessee

Dear Mr. Kibbey:

On January 17, 2017, I conducted a Compliance Evaluation Inspection (CEI) of the City of Clifton #2 wastewater treatment plant. A CEI is conducted to determine compliance with the permit and to review the operation and maintenance of the treatment plant. The treatment plant receives wastewater from the Turney Center Annex facility and the CCA prison. The following observations were made during the inspection.

1. The current permit became effective on January 1, 2014 and shall expire on November 30, 2018.
2. The wastewater treatment system is set up to report the monthly Discharge Monitoring Reports (DMR's) on the NetDMR reporting system and has been actively reporting since June 2016. A Monthly Operation Report (MOR) is still being submitted to the Columbia Environmental Field Office as required by the permit.
3. The treatment system is a lagoon system with three cells and a polishing pond. There is currently only one surface aerator in cell #1, a diffused surface air bubbler system in cells 2 & 3. There are two paddle wheel aerators that need their gear boxes repaired and four surface aerators that are not in operation that need to be evaluated for repair.
4. Both composite samplers are still capturing sample on time proportional. The permit requires that the samples be captured using flow proportional. Correspondence received from a follow-up Performance Audit Inspection (PAI) referenced that the samplers would be corrected by September 2016. Failure to capture samples based on flow proportional is a violation of the NPDES permit. The tubing needs to be replaced on the influent composite sampler. The tubing should be observed, replaced as needed and recorded in the laboratory log book.

5. The laboratory is equipped to perform the analytical testing requirements of the permit. Laboratory bench sheets were available for review. Labtronix calibrated the laboratory equipment on March 29, 2016. A new *E.coli* comparator tray has been purchased along with a new thermometer for the *E.coli* incubator. A log book is maintained for the laboratory and treatment plant and should include but not be limited to documenting the changing of pH probes, DO membranes, replacing composite sampler tubing and lagoon aerator repairs.
6. A Standard Operating Procedures (SOP) has been developed.
7. The collection system is a gravity flow system. There have been no overflows reported since the previous inspection where the Turney Center Annex and the CCA wastewater flows intersect. Any overflows from the grinder and bar screen on the CCA sewer line must be reported to the Columbia Environmental Field Office within 24 hrs. Additionally, a written report must be submitted to the field office within 5 days of the overflow.

This concludes my observations. Please provide a written response within thirty (30) days of receipt of this letter regarding items 3 and 4 listed above. The response should provide specific actions and completion dates.

I would like to thank Mr. Smith and Mr. Clark for their time and cooperation during the inspection. If you have any questions concerning this correspondence or if we may be of further assistance, feel free to contact me at (931) 840-4166 or by e-mail at gary.horne@tn.gov.

Sincerely,



Gary Horne
Division of Water Resources



TDEC - Division of Water Resources

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TN0067423	Facility Site Name	Clifton STP#2
		Address	510 Forrest Avenue Clifton, TN 38425
Permit Eff. Date:	Jan 1, 2014	Permit Exp Date:	Nov 30, 2018
		SIC Code:	

Compliance Monitoring Information

Compliance Monitoring Activity Name	Compliance Evaluation (non-sampling) (CEI)
* If Bio Monitoring is selected above, select the method used:	
Compliance Monitoring Activity	Evaluation

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	01/17/2017 10:30	Exit Date/Time (mm/dd/yyyy hh:mm):	01/17/2017 12:00
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Facility Representatives

Coty Smith, WWTP Operator, 931-676-3594	Doug Kibbey, City Manager, 931-722-0663
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)		

Compliance Monitoring Reason: Core Program

Compliance Monitoring Agency Type: State Agency Name: TDEC - DWR

Did EPA assist/ Inspection? No Time Physically conducting activity: Days: Hours: 1.5

Inspection Type: State Compliance Monitoring Action Outcome: Not Immediately Corrected

Lead Agency: State Compliance Monitoring Rating Code: Unrated

If Joint Inspection, what was the purpose of the other party?

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input checked="" type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

sample collection violation

EPA and State Representatives

	TDEC-DWR/ Columbia EFO/ 931-840-4166	1/27/17
Inspector's Signature	Agency / Office / Phone	Date
	TDEC-DWR/ Columbia EFO/ 931-840-4153	1/27/17
Manager's Signature	Agency / Office / Phone	Date

(Note: This form can only be printed to an XPS document, then saved for later use.)